

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01963
(MEF-MAH)

**DECLARATION OF VERONICA R.
SALAMA**

I, Veronica R. Salama, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Veronica R. Salama. I am a licensed attorney in good standing in the state of New York. I am an attorney of record in the above-captioned case. I am an attorney at the New York Civil Liberties Union Foundation, and I represent the petitioner, Mahmoud Khalil, in this action.
2. Attached hereto, at the exhibits listed below, are true and correct copies of the following declarations:
 - A. Attached as **Exhibit A** is the Declaration of Petitioner-Plaintiff Mahmoud Khalil, dated July 9, 2025.
 - B. Attached as **Exhibit B** is the Declaration of Johnny Sinodis, partner at Van Der Hout LLP and representing Mr. Khalil's in this matter and in his immigration proceedings, dated July 9, 2025.

- C. Attached as **Exhibit C** is a Fact Sheet published by The White House on January 30, 2025, entitled “Fact Sheet: President Donald J. Trump Takes Forceful and Unprecedented Steps to Combat Anti-Semitism.” This Fact Sheet is also available at <https://perma.cc/9EGDT9P7>.
- D. Attached as **Exhibit D** is the Declaration of former Principal Legal Advisor for U.S. Immigration and Customs Enforcement (“ICE”) and former Immigration Judge Kerry Doyle, in her personal capacity, dated July 9, 2025, explaining that the immigration court’s June 20 decision and order sustaining two counts of the misrepresentation charge against Mr. Khalil “appears highly unusual.” This declaration supplements her prior declaration from June 4, 2025, ECF No. 281-16.
- E. Attached as **Exhibit E** is the Declaration of former immigration judge Dana Leigh Marks, who has 35 years of experience in that role, in her personal capacity, dated July 9, 2025. In her declaration, she opines that the immigration court’s June 20 decision and order sustaining the misrepresentation charge against Mr. Khalil is “not at all supported by the evidence and caselaw.”
- F. Attached as **Exhibit F** is the Declaration of the Charles L. B. Lowndes Distinguished Professor of Law and Professor of Sociology at Duke University School Emily Ryo, an empirical legal scholar whose current research focuses on immigration enforcement, immigration court decision-making, and the criminal justice system, dated July 8, 2025. Her declaration presents an analysis of datasets from 2012 to 2022 released by the Executive Office of Immigration Review and the Immigration and Customs Enforcement. Based on this analysis, she concludes that it is “exceedingly rare for federal immigration officials to detain individuals who are similarly situated as Mr. Khalil throughout their removal proceedings.”
- G. Attached as **Exhibit G** is an article by Jonah E. Bromwich published by *The New York Times* on June 22, 2025, entitled “‘It Felt Like a Kidnapping,’ Khalil Says in First Interview Since Release.” This article is also available at <https://perma.cc/RZ99-QDUJ>. The reporter includes a statement from the White House spokesperson Abigail Jackson, in which she characterizes Mr. Khalil and others as “individuals who don’t have a right to be in the United States siding with Hamas terrorists and organizing group protests,” and states the administration “won’t hesitate to hold Khalil, and others who mimic his tactics, accountable.”
- H. Attached as **Exhibit H** is an article by Leila Fadel published by the *National Public Radio* on June 23, 2025, entitled “‘They wanted to separate me from my family’: Mahmoud Khalil speaks after ICE release.” This article is also available at <https://perma.cc/98JZ-XVGS>. The reporter includes an excerpt from Homeland Security Assistant Secretary Tricia McLaughlin in which she states that Mr. Khalil “should use the CBP Home app to self-deport.”

Executed on July 9, 2025
New York, New York



Veronica R. Salama
Staff Attorney
New York Civil Liberties Union Foundation